

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

IN RE:

Chapter 9

City of Detroit, Michigan .

Case No. 13-53846  
Hon. Thomas J. Tucker

Debtor.

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**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the Detroit Police Lieutenants and Sergeants Association (the “Appearing Party” or the “DPLSA”) hereby appears by its counsel, Erman, Teicher, Zucker & Freedman, P.C. (“Erman Teicher”),<sup>1</sup> and request, pursuant to 11 U.S.C. §§ 102(1) and 1109(b) and Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), that all notices given in this case and all papers served or required to be served in this case, be given to and served upon the undersigned attorney, at the address set forth below:

Barbara A. Patek, Esq.  
Erman, Teicher,  
Zucker & Freedman, P.C.  
400 Galleria Officentre, Ste. 444  
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Facsimile: (248) 827-4106  
Email: [bpatek@ermanteicher.com](mailto:bpatek@ermanteicher.com)

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<sup>1</sup> Erman Teicher originally filed a notice of appearance on behalf of the DPLSA on July 22, 2013 [Docket No. 87]. Erman Teicher also appeared as counsel for the Detroit Police Officers Association (the “DPOA”), the Detroit Firefighters Association, IAFF Local 344 (the “DFFA”) and the Detroit Police Command Officers Association (the “DPCOA”) in these proceedings. Pursuant to a Motion to Withdraw as Counsel for Some of the Detroit Public Safety Unions filed by Erman Teicher on May 8, 2014 [Docket No. 4537], this Court entered an order on May 12, 2014 allowing Erman Teicher to withdraw as counsel for the DPLSA and the DPCOA [Docket No. 4630]. Erman Teicher’s withdrawal was based on a conflict that developed when the DPLSA and DPCOA reached tentative agreements that included support of the Grand Bargain and proposed plan of adjustment while DPOA and DFFA were still negotiating with the City and objecting to the plan of adjustment. That conflict was resolved when the DPOA and DFFA each reached collective bargaining agreements with the City, withdrew their objections and agreed to support the Grand Bargain and Plan of Adjustment. Erman Teicher continues to represent the DPOA in these proceedings and now files this appearance on behalf of the DPLSA.

**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand filed in this matter, whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile or otherwise.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance and Request for Service of Papers (the "Notice") nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in these cases or any case, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice, (v) an election of remedies, (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

ERMAN, TEICHER,  
ZUCKER & FREEDMAN, P.C.

By: /s/ Barbara A. Patek  
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DATED: March 13, 2015

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